

**THE OFFICE OF REGULATORY STAFF
SURREBUTTAL TESTIMONY
OF
WILLIE J. MORGAN, P.E.**

JULY 6, 2010



DOCKET NO. 2009-473-WS

**Application of Tega Cay Water Service,
Incorporated for Adjustment of Rates
and Charges**

SURREBUTTAL TESTIMONY OF WILLIE J. MORGAN, P.E.

FOR

THE OFFICE OF REGULATORY STAFF

DOCKET NO. 2009-473-WS

IN RE: APPLICATION OF TEGA CAY WATER SERVICE, INCORPORATED

FOR ADJUSTMENT OF RATES AND CHARGES

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND
OCCUPATION.**

A. My name is Willie J. Morgan, and my business address is 1401 Main Street, Suite 900, Columbia, South Carolina 29201. I am employed by the South Carolina Office of Regulatory Staff (“ORS”) as the Program Manager for the Water and Wastewater Department.

**Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN
THIS PROCEEDING?**

A. The purpose of my surrebuttal testimony in this proceeding is to respond to specific portions of rebuttal testimony provided by Mr. Bruce Haas for Tega Cay Water Service, Inc. (“TCWS”). I will focus on Mr. Haas’ rebuttal testimony related to TCWS compliance with Commission regulation 103-714, preventative maintenance on the wastewater collection system, metering of water system at release points and the performance bond.

**Q. DID TEGA CAY WATER SERVICE, INC. PROVIDE THE “TIME AND
DURATION” OF ANY SERVICE INTERRUPTIONS AFFECTING ITS**

**THE OFFICE OF REGULATORY STAFF
1401 Main Street, Suite 900
Columbia, SC 29201**

**CUSTOMERS TO ORS AS REQUIRED BY 26 S.C. CODE ANN. REGS.
103-714.A (SUPP. 2009)?**

A. No. While TCWS routinely notifies ORS of boil water advisories and routine maintenance and flushing using its Voice Reach notification system, TCWS did not provide ORS with a record of the “time” and “duration” of any service interruption affecting customers in the Tega Cay service area. ORS requested this information in its Second Continuing Information Request (Question No. 2.4). TCWS did not provide a complete response and ORS is unable to conclude TCWS has complied with Commission Regulation 103-714.A.

**Q. DID TEGA CAY WATER SERVICE, INC. PERFORM PREVENTATIVE
MAINTENANCE ON ITS WASTEWATER COLLECTION SYSTEM
DURING THE TEST YEAR TO REDUCE THE NUMBER OF SANITARY
SEWER OVERFLOWS?**

A. Mr. Haas states in his rebuttal testimony (page 4 lines 16-18) that TCWS tries to take a “proactive” approach to collection system maintenance. ORS’ review of TCWS test year expenses did not reveal that TCWS incurred expenses related to preventative or routine wastewater collection system maintenance. Based on the test year expense records, TCWS performed television inspection after a sanitary sewer overflow occurred to identify where the blockage was located.

**Q. WHAT IS YOUR RESPONSE TO MR. HAAS’ ASSERTION THAT
RETRO-FITTING EACH RELEASE POINT TO INSTALL A METER IS
COSTLY?**

1 A. ORS agrees that some additional cost will be incurred to accurately
2 monitor water system flushing. This cost will be off-set by the resulting savings
3 to consumers in that the consumer will only pay for the water supply charge based
4 on water actually used in flushing. According to its responses to ORS and Mr.
5 Haas' rebuttal testimony, TCWS does not document or calculate water system
6 flushing usage in a consistent manner. ORS would encourage TCWS to
7 document system flushing usage consistently and investigate the feasibility of
8 using portable meters to measure flushing usage.

9 **Q. DOES THAT CONCLUDE YOUR SURREBUTTAL TESTIMONY?**

10 A. Yes it does.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2009-473-WS

IN RE:

Application of Tega Cay Water Service,
Incorporated for Adjustment of Rates and
Charges (Letter of Intent)

)
) **CERTIFICATE OF**
) **SERVICE**
)

This is to certify that I, Chrystal L. Morgan, have this date served one (1) copy of the **SURREBUTTAL TESTIMONY AND EXHIBITS OF CHRISTINA A. STUTZ AND WILLIE J. MORGAN** in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below:

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Chrystal L. Morgan

July 6, 2010
Columbia, South Carolina